

2 November 2011

The Research Director
Environment, Agriculture, Resources and Energy Committee
Parliament House
George Street
BRISBANE QLD 4000

RE: Strategic Cropping Land Bill 2011

Dear Sir / Madam,

FBA commends the Queensland Government for introducing the *Strategic Cropping Land Bill 2011* to Parliament on 25 October 2011.

FBA is the leading community based organisation for sustainable natural resource management in Central Queensland. Our region contains some of the most significant cropping land in Queensland, including the Central Protection Area. While we generally support the Strategic Cropping Land (SCL) Bill and Strategic Cropping Land Draft State Planning Policy, we are concerned that some provisions in the SCL Bill do not adequately protect high-value cropping land (refer Attachment 1).

FBA is committed to long term sustainable use of our natural resources, and we value healthy ecosystems, a strong regional economy and a prosperous community. Membership of FBA comprises a broad cross section of the community, including representatives from sectors of Landcare, conservation, education, research, industry and agriculture as well as representatives from Indigenous groups and local and Queensland Government agencies.

If you have any questions regarding our comments, please contact Suzie Christensen, Chief Executive Officer, on (07) 4999 2827 or Suzie.Christensen@fba.org.au.

Yours sincerely,



Suzie Christensen
Chief Executive Officer

Attachment 1: FBA's submission on the *Strategic Cropping Land Bill 2011*

1. *SCL Principles (s11, p20-21)*. FBA supports the SCL Principles, and in particular, the precedence of the 'protection principle'. This principle must be fully and consistently applied to any development that will affect SCL if this legislation is to be effective in protecting SCL now and in the future.
2. *Chapter 4: Exceptional circumstances, p72-81*. FBA supports the exclusion of the majority of resource activities from being eligible for 'exceptional circumstance' status. Resource activities must remain subject to the full range of SCL provisions if the legislation is to properly protect Queensland's significant cropping lands.
3. *Chapter 5, Part 3: Strategic cropping land mitigation fund, p86-88*. FBA supports the establishment of a SCL mitigation fund, however, we seek assurance that money paid into this fund must be used exclusively for activities that will benefit cropping lands. FBA requests that the SCL Bill be amended to include more stringent provisions regarding the use of the mitigation fund, particularly that money in this fund is not subject to government cost-shifting (e.g. to pay for government administration activities that should be funded under regular budgeting) or able to be resumed by Queensland Treasury and used for non-SCL activities.
4. *Division 4: Provision for future environmental authority or mining lease relating to EPC 891 (p161, s283)*. FBA objects to the special transitional arrangements granted to the holders of EPC 891 (Springsure Creek Coal Pty Ltd). Springsure Creek Coal Pty Ltd were not granted finalised Terms of Reference for their project's Environmental Impact Statement until 2 June 2011, this being clearly outside the 31 May 2011 'exclusion period' (refer s275-277) where existing projects are not subject to full SCL Bill provisions. *Section 283* should be removed from the SCL Bill and the Springsure Creek Coal project evaluated according to full SCL Bill provisions.

If the Springsure Creek Coal project is granted a mining lease and environmental authority by the Queensland Government and Division 4 of the SCL Bill is legislated, the impacts from the coal project (e.g. subsidence of high-value cropping land) will degrade the SCL within the lease, making this land unsuitable for cropping.